MCI Telecommunications Corporation
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EX PARTE OR LATE FILED

Donald F. Evans
Vice President
Federal Regulatory Affairs

JUL 16 1996

EX PARTE

July 16, 1996

William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 96-98

Dear Mr. Caton:

On July 16, 1996, I provided the attached written ex parte at the request of the staff.

Please place a copy of and this notice and the attached in the record of this proceeding.

Sincerely,

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This paper is submitted in response to staff's request to address the paper submitted by Ameritech on July 15, 1996, which purports to address MCI's reasonable request to have Network Interface Devices (NID) identified and required as an unbundled network element.

As an initial point it is important to note that Ameritech has not refuted MCI's claim that provision of unbundled NIDs is technically feasible. Therefore, under Sec. 251(c)(3) Ameritech has failed to meet its burden of proof that unbundled NIDs are not technically feasible.

Ameritech makes three incorrect, bald claims in its paper which MCI will demonstrate are false. First, Ameritech claims that unbundling of the NID is not needed to facilitate facility based competition. If MCI did not need access to the NID in order to connect to existing inside wire it would not ask for the NID as an unbundled element. Absent access to the NID, MCI would have to install another NID (to the extent space which is allocated for telephone company facilities to terminate is available). Ameritech's argument is just as ridiculous as saying that MCI would not need unbundled loops to facilitate facility based competition.

Second, Ameritech states unbundling of the NID would be inefficient but offers no reasoning for this bald statement. MCI believes that lack of an unbundled NID will be inefficient in that MCI would have to install additional NIDs in spaces which may have

limited space available. In addition, if multiple new entrants provide services in a building, adding a NID for each new entrant will quickly, and unnecessarily, consume space -- for no good reason.

Third, Ameritech states that unbundling the NID could create a serious safety hazard. Ameritech is obviously confused. In Bellcore's publication on indoor NIDs[1] the function of an indoor NID is explained. As stated in the document, "The functions of the indoor telephone NID are as follows: * Provide a demarcation point between the company telephone loop and subscriber wiring * Serve as a convenient test point for verification of loop integrity * Provide the subscriber with access to the station wiring * Serve as a convenient test point for verification of subscriber's inside wiring." It is perfectly clear and not hard to understand that NIDs are not designed to provide over-voltage protection. Apparently Ameritech is attempting to describe a what is known as a protector module. A protector module is designed to "Minimize electrical hazards to personnel and damage to equipment and wiring by limiting voltage and currents entering the building through outside cable pairs."[2] MCI has not requested access to the protector module of a building entrance terminal (BET). However,

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[1] See, Technical Reference TR-NWT-000239, Section 1.2, Issue 2, December 1993, Generic Requirements for Indoor Telephone Network Interface Devices (NIDs).

[2] See, Bellcore Technical Reference TR-NWT-000937, Issue 1, January 1993, Generic Requirements for Outdoor and Indoor Building Entrance Terminals (BETs), at 1. INTRODUCTION.

to the extent that BETs contain protector modules and NIDs[3], MCI does request access to the NID housed within the BET.[4]

Ameritech also makes a guess as to why MCI has requested access to the NID in stating that MCI does not want to install its own connecting equipment at its own expense. Bad guess. MCI has requested access to the NID in order to access inside wire -- a connection required to provide its telecommunications services as envisioned by Sec. 251(c)(3) of the Act.

Finally, based on MCI's understanding of Ameritech's offer to provide access to what is really the NID (based on MCI's understanding of Ameritech's options), there appears to be no disagreement between MCI's request and Ameritech's stated offer to provide access to the NID. Since MCI has yet to request access to the BET protector module[5], which is also technically feasible and presents no potential network reliability issues based on the Bellcore documents referenced in the above, MCI considers this

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[3] In order to avoid any confusion MCI here points out that in some cases the equivalent of a NID is sometimes known generally as a Network Interface Module in a BET configuration. Regardless of the naming, MCI wishes to make clear that it requests access to the demarcation point of inside wire and loop plant.

[4] Although it is difficult to follow Ameritech's option drawings attached to their paper, it appears that Ameritech is attempting to depict connections to a NID housed within a BET. Depending on the configuration of the inside wire, those four "options" depicted by Ameritech could be acceptable but other options may exist that should not be excluded.

[5] As described in the above, Ameritech apparently misunderstands the difference between a BET and an NID which has resulted in its paper which does not address the NID as an unbundled element.

issue resolved and urges the Commission to order incumbent local exchange carriers to provide access to the NID as an unbundled element.